



Historic England

Hornsea Project Four limited Project Team
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol BS1 6PN

29th March 2022

Dear Ms Dowling,

Application by Ørsted Hornsea Project Four Limited for an Order Granting Development Consent for the Hornsea Project Four Offshore Wind Farm

The Examining Authority's written questions and requests for information (ExQ1) Issued on 28 February 2022

Planning Inspectorate Ref: EN010098

Our Registration ID: 20029898

The Historic Buildings and Monuments Commission for England (known as Historic England) is the Government's advisor on all aspects of the historic environment in England. Historic England's general powers under section 33 of the National Heritage Act 1983 were extended (via the National Heritage Act 2002) to modify our functions to include securing the preservation of monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England. We also provide our advice in recognition of the English marine plan areas (inshore and offshore) as defined by the Marine and Coastal Access Act 2009, the UK Marine Policy Statement and National Policy Statements.

Further to receipt of your letter and the first set of written questions, we hereby offer the following response to those questions directed to Historic England.



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Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.

Question: HE 1.1

Expand on and clarify Relevant Representation [RR-015]

Would Historic England (HE) please expand on and clarify the specific concerns raised in its Relevant Representation [RR-015] about the proportionate approach to EIA that has been taken in this application.

HBMCE Response

We have provided a detailed review in our Written Representation, which we summarise here. We appreciate that the Applicant has provided an explanation as to why a proportionate approach was adopted for this EIA exercise. The specific concern we have is in regard to how the construction phase was scoped out of the EIA on the basis of a commitment to deliver embedded mitigation. We understand that an adaptive approach to mitigation is necessary in consideration of unknown elements of the historic environment as may be present. It is a crucial phase of successful project delivery that archaeological advice informs post consent/pre-commencement survey activities. We therefore wish to understand how the Commitments Register will be delivered as identifiable components within any DCO granted, in addition to the measures set out in the draft DCO which provide for archaeological mitigation (vis. Schedule 11 and 12, Part 2; draft Deemed marine Licences. Conditions 13(2) & 13(3) through delivery of measures, inclusive of a Marine Written Scheme of Archaeological Investigation.

Question: HE 1.2

Comments on Outline Marine Written Scheme of Investigation

Please comment in detail on whether the Outline Marine Written Scheme of Investigation [APP-239] is sufficient to satisfy HE's concerns [RR-015] about management of risk to marine archaeological assets, and if not, why not.

HBMCE Response

In our Written Representation we have identified a few matters which should be addressed within any project-specific marine archaeological Written Scheme of Investigation (WSI) to be produced post-consent to inform any and all activities that subsequently occur, as necessary to inform the design and delivery on any consented development. We are aware from the ES that there are aspects of the assessment of survey data that were not completed prior to DCO application and therefore the methodological approaches set out in the Outline Marine WSI are crucial. Overall, we are satisfied by the Outline Marine WSI submitted.

Question: HE 1.3

Impact on historic seascapes

Does HE accept the Applicant's assessment [APP-021 para 9.7.2.18] that "...it is considered that the impact on the historic seascapes by the introduction of wind farm infrastructure does not warrant further methodological development or mitigation" and if not, why not?

HBMCE Response

We are prepared to concur that further methodological development in terms of how spatial perceptions of historic seascape character can be generated is not required. In our Written Representation we have referred to the completed and published



methodology available online (via the Archaeological Data Service). The important task for the Applicant is to demonstrate the use of this methodological approach to demonstrate how they have produced their perception of how historic character and whether change can be accommodated as proposed. The consideration of change as could be introduced by this project should be set out as narrative text and supported by spatial analysis informed by the Maximum Design Scenario.

Question: HE 1.6

Impact assessment

The Applicant's Impact Register [APP-049, page 57] reports that, following a route refinement process, the onshore export cable corridor now incorporates a Scheduled Monument at York Road. For this reason, direct impacts on designated heritage assets during construction were scoped back in for assessment.

The Impact Register suggests this was a 'Simple Assessment' rather than a 'Detailed Assessment'. Given the potential for an impact on a Scheduled Monument. Do you agree with this approach?

If you do not agree, please set out the reasons for this and indicate what further action you believe to be required.

HBMCE Response

HBMCE have reviewed the question and relevant documents (Vol 6, annex 5.1 Historic Environment Desk Based Assessment, part A, para 6.8.2.4). The nationally important designated Scheduled Monument referred to here is 'Beverley sanctuary limit stone, Bishop Burton cross', NHLE 1012589. Of 13th century date, the monument is one of three surviving medieval Liberty stones (there were four originally) which defined the Liberty and Sanctuary of Beverley Minster. The cross is comprised of a decorated 2 meter high surviving limestone shaft upon a meter square stone base, and is located 10 meters inside a field, beyond a boundary hedge along the south side of the A1035, between the village of Killingwoldgraves and Beverley racecourse.

The remains of the stone cross are surrounded by a modern wooden fence. Although the cross has lost its cross head and displays some post-Elizabethan damage, the cross has significance because it is one of three original surviving stones and is intimately connected with Beverley Minster. It is also associated with a named individual, indicated by an inscription on the cross, which is now lost. The idea of Sanctuary and Liberty provided by a church, dates back to the Anglo-Saxon period. Once an individual had crossed the boundary defined by the stones, they could invoke the protection of the church, and this protection increased the closer the individual got to the altar of the church. Beverley was one of several great churches in the north of England known as sanctuary refuges, the others being Ripon, Hexham, York and Durham. At the latter two sites, sanctuary began only at the church door.

The cross is believed to be in its original location and therefore has high evidential, and historical value.

We agree with the applicant's assessment that there will be no physical impact on the designated site and that construction related activities will temporarily alter its setting, but this is considered to be a short-term adverse impact upon its significance. Therefore, we are content to agree with the 'Simple Assessment' approach.



Question HE 1.9

Further mitigation measures

[APP-029, para 5.11] sets out a series of measures under the heading “Further mitigation: built heritage” that could be put into effect in order to further lessen the impact from the Proposed Development prior to construction works commencing. Set out the barriers which exist that prevent these measures being agreed during the Examination and the steps necessary to overcome these barriers so that agreement can be reached and secured during the Examination.

HBMCE response

HBMCE are content to leave comment on Grade II listed structures to the Local Authority.

HBMCE has reviewed the ‘further mitigation measures’, and our concern is with the security of the ‘Beverley sanctuary limit stone, Bishop Burton cross’, NHLE 1012589, during the works process.

Whilst we agree with the use of the Simple Assessment approach, and concur with the assessment of impact identified by the applicant (see our response to Question HE 1.6) that there will be no physical impact of the scheme on the Sanctuary stone, it remains the case that the safety and protection of heritage assets during the construction process is reliant on effective communication between all parties (applicant, contractor, sub-contractor).

In order to ensure that culturally significant material is correctly identified and demarcated, it is essential that the applicant sets out a clear suite of best work practices at this early stage, detailing responsibilities, working methods (including ‘tool-box talks’), risk assessments and reporting procedures.

HBMCE recommends that there should be a specific requirement in the DCO requiring submission of detail and sign off from HBMCE regarding the measures to be adopted by the applicant to ensure the safety of the Sanctuary stone and its setting during the works process.

Question LV 1.2

Representative viewpoints

The Applicant notes [APP-028, Table 4.4] that the viewpoints presented have been agreed by all stakeholders.

Is the selection of viewpoints presented by the Applicant satisfactory or do you believe that additional viewpoints are required?

If you believe additional viewpoints are required, please provide further details to explain why they are required.

HBMCE response

HBMCE has reviewed the list of viewpoints identified in ‘Vol 6, Annex 4.1: Landscape and Visual Resources: Wireframes and Photomontages’, and we consider that the selection of viewpoints presented by the Applicant is limited.



We note that the Onshore substation (OnSS) with Energy Balancing Infrastructure (EBI) and associated lightning protection, located to the north of Cottingham, East Riding of Yorkshire, is a large structural intervention in the landscape. The heights of the intervention range from 15 meters (EBI) to 25 meters (OnSS) and 30 meters (lightning protection).

The buildings and landscape screening are presented at Year 1, Year 10 and Year 30 following completion.

However, as stated in our 'PINS Registration and Relevant Representation Form', we are concerned that the presentation of the assessment of the impact of the structures is limited to views from existing access points and PROW, whilst opportunities to minimise the harm generated are described as 'aspirations'.

It is established practice in the assessment of impacts on setting, that views are not limited to public access and PROW locations. Additional wireframes and photomontages are to be presented by the applicant illustrating a 'dynamic' or 'kinetic' progression through the landscape, illustrating the manner in which the relationship of views to and of the proposed structures and designated heritage assets unfold, specifically in the locations of Risby Park (NHLE 1018600; NHLE 1001419), Cottingham (NHLE 1347016) and Woodmansey (NHLE 10007731)

Opportunities to minimise 'harm' generated by the proposed structures are to include considered and definite schemes for increased planting and screening and the use of recessive colour schemes for the buildings.

HBMCE recommends that there should be a specific requirement in the DCO requiring submission of detail and sign off from HBMCE to ensure that:

- A) the 'dynamic' photomontages are undertaken and assessed; and
- B) the planting/screening proposals and the colour palette for the proposed buildings are contained within a Construction Environmental Management Plan.

Question LV 1.3

Cumulative effects

Are you satisfied with the list of projects included in the assessment of potential cumulative landscape and visual effects [APP-028, Tables 4.23 and 4.24]?

If not, identify those projects that you believe should be included and indicate why you believe that they should be included.

HBMCE response

HBMCE has reviewed the list of projects included in the assessment of potential cumulative landscape and visual effects. We consider the published list to be appropriate, and we are not able to identify any further projects for inclusion.

Yours sincerely,


Dr Christopher Pater
Head of Marine Planning



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